## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

VALLEY FORGE INSURANCE COMPANY,	
Plaintiff,	) )
-V-	) )    Civ. Action # 1:14-cv-00792-MRB
FISHER KLOSTERMAN, INC.,	) )
Defendant.	) )

## <u>DEFENDANT FISHER KLOSTERMAN, INC.'S NOTICE OF</u> <u>DEPOSITION TO BRIAN FRANKL</u>

PLEASE TAKE NOTICE that the undersigned attorneys, pursuant to Federal Rule of Civil Procedure 30, intend to take the deposition upon oral examination of Brian Frankl.

The deposition will commence at 9:00 a.m., on Wednesday, June 14, 2017, at the office of Katz Teller, 255 East Fifth Street, 24th Floor, Cincinnati, Ohio 45202, or at another mutually-agreeable location, upon oral examination before a videographer. The deposition is being taken for purposes of discovery, for use at trial, or such other purposes, as are permitted under the applicable and governing rules.

Dated: May 30, 2017

By: /s/ Matthew A. Rich

Matthew A. Rich, Esq. (0077995) KATZ TELLER

255 East Fifth Street, 24th Floor

Cincinnati, Ohio 45202 Telephone: (513) 977-3475 mrich@katzteller.com

Pamela D. Hans, Esq. ANDERSON KILL P.C. 1760 Market Street, Suite 600 Philadelphia, PA 19103 Telephone: (267) 216-2700 phans@andersonkill.com Carrie Maylor DiCanio, Esq. ANDERSON KILL P.C. 1251 Avenue of the Americas New York, New York 10020 Telephone: (212) 278-1046 cdicanio@andersonkill.com

Attorneys for Defendant FISHER KLOSTERMAN, INC.

## **CERTIFICATE OF SERVICE**

I hereby certify that on May 30, 2017, I caused the foregoing Notice of

Deposition to Brian Frankl to be served via email to counsel of record in this matter:

Thomas B. Bruns BRUNS, CONNELL, VOLLMAR & ARMSTRONG, LLC 4750 Ashwood Drive, Suite 200 Cincinnati, OH 45241 Telephone: 513-312-9890

Fax: 513-800-1263

Email: tbruns@bcvalaw.com

Kathryn M. Frost ELENIUS FROST & WALSH 333 South Wabash Avenue, 25<sup>th</sup> Floor Chicago, IL 60604

Telephone: 312-822-2659

Fax: 312-817-2486

Email: Kathryn.Frost@cna.com

/s/ Matthew A. Rich Matthew A. Rich, Esq. (0077995)

KTBH: 4850-8848-3657, v. 1